

1 Mildred K. O'Linn (State Bar No. 159055)
missy.olinn@manningkass.com

2 Lynn Carpenter (State Bar No. 310011)
lynn.carpenter@manningkass.com

3 Maya Sorensen (State Bar No. 250722)
Maya.Sorensen@manningkass.com

4 **MANNING & KASS**
ELLROD, RAMIREZ, TRESTER LLP
5 801 S. Figueroa St., 15th Floor
Los Angeles, CA 90017
6 Main: (213) 624-6900

7 Attorneys for Defendants, CITY OF
FRESNO, UNKNOWN LAW
8 ENFORCEMENT OFFICERS, and
POLICE CHIEF PACO BALDERRAMA
9

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**
12

13 MARTHA ZEPEDA OLIVARES,
individually and on behalf of the
14 ESTATE OF MAXIMILIANO SOSA,
JR.; MAXIMILIANO SOSA, SR.,

15 Plaintiffs,

16 v.

17 CITY OF FRESNO, UNKNOWN
18 LAW ENFORCEMENT OFFICERS,
POLICE CHIEF PACO
19 BALDERRAMA and DOES 1-30,

20 Defendants.

21

MARIA SOSA, L.S. by and through
22 guardian ad litem MARIA SOSA, M.S.
by and through guardian ad litem
23 JENNIFER LOPEZ, individually and as
24 successors-in-interest to Maximiliano
Sosa,

25 Plaintiffs,

26 v.

27 CITY OF FRESNO and DOES 1-5,
28 Defendants.

Case No. 1:23-cv-01575-JLT-SAB
District Judge Jennifer L. Thurston
Magistrate Judge Barbara A. McAuliffe

**Defendants' Statement of Non-
Opposition to Plaintiffs' Motion to
File Amended Complaints**

Judge: Hon. Stanely A. Boone
Courtroom: 9, 7th Floor
Date: July 30, 2025
Time: 10:00 a.m.

Olivares SAC Filed: 2/24/2025
Sosa SAC Filed: 10/04/24

Trial Date: April 6, 2027

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Defendants do not oppose Sosa plaintiffs' motion to amend their complaint (Doc. 57) or Olivares plaintiffs' joinder to that motion (Doc. 59). Defendants will file timely responses to both amended complaints.

DATED: June 26, 2025

Respectfully submitted,

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ *Maya R. Sorensen*

Mildred K. O'Linn

Lynn Carpenter

Maya Sorensen

Attorneys for Defendants, CITY OF

FRESNO; UNKNOWN LAW

ENFORCEMENT OFFICERS, and

POLICE CHIEF PACO BALDERRAMA